

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SUMMER CAMPBELL,

Plaintiff.

v.

LIBERTY MUTUAL
INSURANCE,

Defendant.

Case No. 1:23-cv-5101

Judge John F. Kness

Magistrate Judge M. David Weisman

JOINT STATUS REPORT

Pursuant to the Order entered by Magistrate Judge Weisman (Dkt. #124) on July 28, 2025, Plaintiff Summer Campbell and Defendant Liberty Mutual Insurance submit the following Joint Status Report.

1. The Parties have exchanged discovery requests and responses. Liberty Mutual provided supplemental responses to Ms. Campbell on July 25, 2025, and August 18, 2025.
2. Ms. Campbell believes those supplemental responses to be deficient for the reasons set forth in her Motion to Compel, which she filed on August 29, 2025. [Dkt. 127.]
3. The parties anticipate discussing Ms. Campbell's concerns and those of Liberty Mutual's, outlined below, during the status hearing, scheduled for Friday, September 5, 2025, at 10:00 a.m. central. [Dkt. 126.]
4. Both parties exchanged Requests to Admit on August 22, 2025, per the Court's Order. *See e.g.*, Dkt. 124 and 125.
5. Liberty Mutual sent subpoenas for Ms. Campbell's medical records, for which she executed certain releases, the week of July 28, 2025. Two of those providers have responded.

Several other provider records remain outstanding; Liberty Mutual is following up with Ms. Campbell's providers to obtain those records.

6. Liberty Mutual requests that Ms. Campbell identify additional health care providers going back to 2015; this request is made based on a number of statements made in her discovery responses and documents produced that suggest more complicated medical conditions. Thus far, Ms. Campbell has not agreed to identify additional providers. (*See Exhibit A.*)

7. Liberty Mutual requests that Ms. Campbell sign a release for the files related to a diagnostic report completed by Dr. Natalie Engelbrecht, which was produced by Ms. Campbell in discovery. Ms. Campbell has agreed to provide the intake questionnaire she completed, but Liberty Mutual would like to discover any other information on which Dr. Engelbrecht may have relied in creating that report. Ms. Campbell has not agreed to sign a release for the records of Dr. Engelbrecht. (*See Exhibit A.*)

8. Once all relevant medical records are received, Liberty Mutual will seek to depose Ms. Campbell. Liberty Mutual will also seek to depose several of Ms. Campbell's treaters/healthcare providers and may seek leave of the Court to conduct a Rule 35 Independent Medical Examination of Ms. Campbell.

9. Liberty Mutual proposes a February 28, 2026, close of discovery.

10. Ms. Campbell intends to depose four to six employees from Liberty Mutual including Colleen Busby, Michelle Warstler, and Stephanie Falconer.

11. Ms. Campbell proposes a March 2, 2026, close of discovery.

12. The parties are to appear before Magistrate Judge Weisman on September 5, 2025, at 10:00 a.m. (Dkt. 126.) The hearing will be held telephonically at the previously identified call-in number.

Respectfully submitted,

Dated: September 3, 2025

SUMMER CAMPBELL

By: s/Summer Campbell
Plaintiff (pro se)

Summer Campbell
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708-530-9293

Dated: September 3, 2025

LIBERTY MUTUAL INSURANCE

By: s/Erin Dougherty Foley
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CERTIFICATE OF SERVICE

I hereby certify that on September 3, 2025, I electronically filed the foregoing Joint Status Report with the Clerk of the Court for the United States District Court for the Northern District of Illinois using the CM/ECF system. All participants in the case are registered CM/ECF users and will be served by the CM/ECF system.

By: *s/Erin Dougherty Foley*
Erin Dougherty Foley